

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GWG HOLDINGS, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 22-90032 (MI) (Jointly
Administered)

MICHAEL I. GOLDBERG, as Trustee of the GWG
LITIGATION TRUST,

Plaintiff,

v.

Adv. Pro. No. 24-03090 (MI)

BRADLEY K. HEPPNER, individually and in his
capacity as Trustee of THE BRADLEY K.
HEPPNER FAMILY TRUST, THE HEPPNER
FAMILY HOME TRUST, THE HIGHLAND
BUSINESS HOLDINGS TRUST, and THE
HIGHLAND INVESTMENT HOLDINGS TRUST;
BENEFICIENT CAPITAL COMPANY, L.L.C.;
BENEFICIENT CAPITAL COMPANY II, L.L.C.;
BENEFICIENT COMPANY HOLDINGS, L.P.;
BENEFICIENT HOLDINGS, INC.;
BENEFICIENT MANAGEMENT, L.L.C.;
BRADLEY CAPITAL COMPANY, L.L.C.;
PETER T. CANGANY, JR.; DAVID F.
CHAVENSON; CT RISK MANAGEMENT,
L.L.C.; ELMWOOD BRADLEY OAKS, L.P.;
TIMOTHY L. EVANS; FUNDING TRUST
MANAGEMENT, L.L.C.; TIMOTHY B.
HARMON, in his capacity as Trustee of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

THE HIGHLAND INVESTMENT HOLDINGS TRUST; HCLP CREDIT COMPANY, L.L.C.; HCLP NOMINEES, L.L.C.; THOMAS O. HICKS; HIGHLAND CONSOLIDATED, L.P.; MURRAY T. HOLLAND; LIQUIDTRUST MANAGEMENT, L.L.C.; RESEARCH RANCH OPERATING COMPANY, L.L.C.; BRUCE W. SCHNITZER; THE BENEFICIENT COMPANY GROUP, L.P.; THE BENEFICIENT COMPANY GROUP (USA), L.L.C.; and JOHN STAHL, in his capacity as Trustee of THE LT-1 COLLECTIVE COLLATERAL TRUST, THE LT-2 COLLECTIVE COLLATERAL TRUST, THE LT-3 COLLECTIVE COLLATERAL TRUST, THE LT-4 COLLECTIVE COLLATERAL TRUST, THE LT-5 COLLECTIVE COLLATERAL TRUST, THE LT-6 COLLECTIVE COLLATERAL TRUST, THE LT-7 COLLECTIVE COLLATERAL TRUST, THE LT-8 COLLECTIVE COLLATERAL TRUST, THE LT-9 COLLECTIVE COLLATERAL TRUST, THE LT-1 LIQUID TRUST, THE LT-2 LIQUID TRUST, THE LT-5 LIQUID TRUST, THE LT-7 LIQUID TRUST, THE LT-8 LIQUID TRUST, and THE LT-9 LIQUID TRUST, Defendants.

NOTICE OF HEARING
[Relates to Doc. Nos. 61 and 62]

PLEASE TAKE NOTICE that on August 29, 2024, Defendants Bradley K. Heppner, in his individual capacity and as purported trustee of The Highland Investment Holdings Trust, The Highland Business Holdings Trust, The Bradley K. Heppner Family Trust, and The Heppner Family Home Trust; Bradley Capital Company, L.L.C.; Elmwood Bradley Oaks, L.P.; Beneficient Holdings, Inc., and Research Ranch Operating Company, L.L.C. filed the Motion of Bradley K. Heppner, in his individual capacity and as trustee of the Highland Business Holdings Trust, The Highland Investment Holdings Trust, The Bradley K. Heppner Family Trust, and The Heppner

Family Home Trust; Beneficient Holdings, Inc.; Bradley Capital Company, LLC; Elmwood Bradley Oaks L.P.; and Research Ranch Operating Company, L.L.C., pursuant to Fed. R. Civ. P. 12(b)(3) and 12(b)(6) and Fed. R. Bankr. P. 7012 to Dismiss the Complaint (“**Heppner and Heppner-Related Entities’ Motion to Dismiss**”) [Doc. No. 61].

PLEASE TAKE FURTHER NOTICE that on August 29, 2024, Defendants Beneficient Capital Company, L.L.C.; Beneficient Capital Company II, L.L.C.; Beneficient Company Holdings, L.P.; Beneficient Management, L.L.C.; CT Risk Management, L.L.C.; The Beneficient Company Group (USA), L.L.C.; The Beneficient Company Group, L.P., filed the *Beneficient Entity Defendants’ Motion to Dismiss* (“**Beneficient Entity Defendants’ Motion to Dismiss**”) [Doc. No. 62].

PLEASE TAKE FURTHER NOTICE that on September 30, 2024, the Court so-ordered the Joint Stipulation to Abate Case Pending Mediation (“**Joint Stipulation**”) [Doc. No. 83]. Pursuant to the Joint Stipulation:

- Defendants who have not responded to the Complaint shall answer, move against, or otherwise respond to the Complaint by **November 4, 2024**.
- Plaintiff shall file oppositions to Defendants’ Motions to Dismiss by **November 25, 2024**.
- Defendants shall file any reply in support of their Motion to Dismiss by **December 16, 2024**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Joint Stipulation, a hearing on the Heppner and Heppner-Related Entities’ Motion to Dismiss and the Beneficient Entity Defendants’ Motion to Dismiss and any other Motions to Dismiss has been set for **December 19, 2024 at 9:00 a.m. (Central Standard Time)** before the Honorable Judge Marvin Isgur in

Courtroom 404, 515 Rusk Avenue, Houston, Texas 77002. The Hearing will take place in person or via telephone and video. In advance of the hearing, you must file your hearing appearance electronically by completing the form available on the Judge Isgur's home page (<https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-marvin-ismur-electronic-appearance-links>).

PLEASE TAKE FURTHER NOTICE that if you wish to participate via telephone, the number is **832-917-1510** and the conference code is **954554**. If you wish to participate via video, the link is <https://www.gotomeet.me/JudgeIsmur>. You will also need an audio connection via telephone.

Dated: October 8, 2024

Respectfully submitted,

By: /s/ James C. Tecce

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Christopher Porter
Tx. Bar No. 24070437
700 Louisiana Street, Suite 3900
Houston, Texas 77002
Telephone: (713) 221-7000
Email: chrisporter@quinnemanuel.com

James C. Tecce (admitted *pro hac vice*)
Kate Scherling (admitted *pro hac vice*)
Eric Kay (admitted *pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Email: jamestecce@quinnemanuel.com
Email: katescherling@quinnemanuel.com
Email: erickay@quinnemanuel.com

Michael Liftik (admitted *pro hac vice*)
Kristin Casey (admitted *pro hac vice*)
1300 I Street NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 538-8000
Email: michaelliftik@quinnemanuel.com
Email: kristincasey@quinnemanuel.com

Counsel to Bradley K. Heppner in his individual capacity and in his capacity as purported trustee of The Highland Investment Holdings Trust, The Highland Business Holdings Trust, The Bradley K. Heppner Family Trust, and The Heppner Family Home Trust; Bradley Capital Company, L.L.C.; Elmwood Bradley Oaks, L.P.; Research Ranch Operating Company, L.L.C.; and Beneficient Holdings, Inc.

ALLEN OVERY SHEARMAN STERLING US LLP

By: /s/ Daniel H. Gold

R. Thaddeus Behrens
Tex. Bar No. 24029440

thad.behrens@aoshearman.com
Daniel H. Gold
Tex. Bar No. 24053230
daniel.gold@aoshearman.com
Ian E. Roberts
Tex. Bar No. 24056217
ian.roberts@aoshearman.com
Matthew A. McGee
Tex. Bar No. 24062527
matt.mcgee@aoshearman.com
William D. Marsh, Jr.
Tex. Bar No. 24092762
billy.marsh@aoshearman.com
The Link at Uptown
2601 Olive Street, 17th Floor
Dallas, TX 75201
(214) 271-5777

*Counsel for Defendants Beneficient Capital
Company, L.L.C.; Beneficient Capital Company II,
L.L.C.; Beneficient Company Holdings, L.P.;
Beneficient Management, L.L.C.; CT Risk
Management, L.L.C.; The Beneficient Company
Group (USA), L.L.C.; The Beneficient Company
Group, L.P.*

CERTIFICATE OF SERVICE

I, James C. Tecce, certify that on October 8, 2024, I caused a true and correct copy of this Notice of Hearing to be served by the Court's CM/ECF system on all parties entitled to notice.

/s/ James C. Tecce

James C. Tecce